

UNITED STATES DISTRICT COURT

for the
Eastern District of WashingtonFILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

Dec 20, 2019

SEAN F. MCAVOY, CLERK

United States of America
v.

Case No. 1:19-MJ-04167-MKD

Douglas Parsley
Defendant

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of 11/23/2018 in the county of Yakima in the Eastern District of
Washington, the defendant violated 18 U. S. C. § 2251(a)(e), an offense described as follows:

did knowingly employ, use, persuade, induce, entice, and coerce a minor, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, which visual depictions were produced and transmitted using materials that were mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

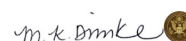
Complainant's signature

Jeff Bickford, TFO, HSI

Printed name and title

☐ Sworn to telephonically and signed electronically. **X mkd**☐ Sworn to before me and signed in my presence.Date: 12/20/2019City and state: ~~Yakima~~, Washington

Dayton (mkd)



Judge's signature

MARY K. DIMKE, U.S. Magistrate Judge

Printed name and title

Detective/Task Force Officer (TFO) Jeff Bickford
Southeast Regional ICAC Task Force
Homeland Security Investigations/Richland Police Department

On 12/17/19 Homeland Security Investigations (HSI) investigators executed a search warrant (1:19-mj-04155-MKD) at 14939 Cottonwood Canyon Road, Yakima WA, the residence of Douglas Parsley. Parsley was present and identified at the time the warrant was executed. During the execution of the search warrant investigators seized a LG X210 cell phone. LG phones are not made in Washington. HSI Task Force Officer (TFO) Jeff Bickford, a digital media examiner was tasked with the triage and subsequent forensic analysis of the phone.

During the triage of the device, TFO Bickford located numerous image and video files depicting children as young as 2-3 years old engaged in sexual activities with adult men. One of the videos depicted an adult male having anal intercourse with what appears to be about a 2 year old, pre-pubescent female. The child was screaming and crying hysterically as she was being anally raped. The video was taken from the perspective of the male who appeared to be standing up. The child was laying on her back and the male was holding her legs up (as if cleaning a dirty diaper) as he used his penis to rape her anus. The identity of the male and female are unknown to TFO Bickford. The video was 43 seconds long. The file name was: 1a6cf6e5-3216-4d88-ba3f-61fd7ace2134.mp4.

In addition to the above described video, there were 39,366 image files on the LG X210 phone. The majority are still being investigated. As of the time of this report, over 100 videos have been located and identified as "Child Abuse Material" or "CAM." The image files depict children in various states of undress engaged in sex acts including both digital and penile penetration of the vagina and anus. The majority of the currently categorized image and videos depict female children between the ages of 2-7 years old.

While reviewing the image files from the LG X210 phone, TFO Bickford located a thumbnail image file which depicted a pre-pubescent female approximately 3 years old. She was naked and lying on her back. Her arms and legs were spread out. Each arm and leg was tied with a rope. The child had what appeared to be a gag in her mouth. The file name was: thumbdata3--1967290299_embedded_573.jpg

Due to quantity of images on the LG X210 cell phone, TFO Bickford used the filtering capabilities of Cellebrite Physical Analyzer to narrow down the content for files with metadata. While reviewing files with metadata, TFO Bickford located numerous images that were taken with a LG-M150 cellular phone. Among these were "selfies" of Douglas Parsley. TFO Bickford also noticed 5 images taken on 11/23/18. The file names and description is as follows:

20181123_122214_Burst01~2.jpg: Capture time: 11/23/2018 12:22:13 PM This photo showed a 2-3 year old girl naked laying on her right side. It is a very pixelated image. Only her naked left side is visible.

20181123_122224~2.jpg: Capture time: 11/23/2018 12:22:24 PM. A 2-3 year female is pictured. She is laying on her back with her legs spread. She is unclothed and her vagina is the focal point of the picture. The girl is laying on a blue/green patterned fabric, possibly a blanket.

20181123_122232~2.jpg: Capture time 11/23/2018 12:22:32 PM: A male thumb and index finder are pinching the bare vagina of a 2-3 year old girl. She appears to be laying on her back and is naked. The focal point is the naked vagina. No identifiers are visible.

20181123_141910.jpg: Capture time 11/23/2018 2:19:10 PM: Approximately 2-3 year old girl with no pants on and legs spread. Her vagina is exposed and a shirt is pulled up to just below the belly button. The focal point is her naked vagina. Her face is not visible. Note: similar description as above however slightly different angle.

20181123_141914.jpg: Capture time 11/23/2018 2:19:14 PM: Approximately 2-3 year old girl with no pants on and legs spread. Her vagina is exposed and a shirt is pulled up to just below the belly button. The focal point is her naked vagina. Her face is not visible.

Noting that the device that took the aforementioned photos, an LG-M150 was the same device that had taken "selfies" of Parsley, TFO Bickford suspected Parsley may have produced the above images taken on 11/23/18. Based on the fact artifacts from the LG-M150 were on the LG X210, it is likely that the LG-M150 was an old phone used by Parsley, was backed up and the backup was restored, by Bluetooth, to the new phone, the LG X210. TFO Bickford filtered the content of the extraction from the LGX210 for dates surrounding 11/23/18. TFO Bickford noticed Facebook messages with T.D.¹ In one of those messages, T.D. provided Parsley the code to get into her home. This occurred on 11/22/18.

Recognizing that Parsley had been in touch with "T.D.", TFO Bickford searched Facebook and found T.D. and realized she had children who were approximately the same age as the children in the photos described above and taken with the LG-M150 cell phone. TFO Bickford notified Homeland Security Investigation Special Agent Tillett of the discovery.

Special Agent Tillett contacted T.D. at her home, which is located in the Eastern District of Washington. During the interview, T.D. did not recognize the blanket or shirt depicted in the photos as they were dark and pixelated. According to Special Agent Tillett, T.D. did say that on 11/23/18, the day after Thanksgiving, she had to work and Parsley babysat her children. At the time, two of her children would have been between approximately 2.5 years old and 3.5 years old. During the conversation T.D. also showed SA Tillett text messages confirming Parsley was with her children on 11/23/18, the day the images were produced. Among them was a message from Parsley indicating the kids fell asleep on him. T.D. provided consent to search her phone. TFO Bickford obtained a forensic extraction of T.D.'s phone on 12/18/19.

It should also be noted that at the time of this affidavit, an HP Laptop seized from Parsley's residence has been triaged. This device also contained an unquantified number of images of pre-

¹ T.D.'s full name is known to TFO Bickford and matched the name on the Facebook messages. Her full name is omitted from this affidavit to protect her privacy and that of her children.

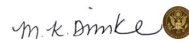
pubescent girls in which their vaginas or anuses were exposed or they were engaged in sex acts. Further forensic analysis will be forthcoming.

I declare and affirm under penalty of perjury that the foregoing is true and correct to the best of my knowledge.



Jeff Bickford
~~Special Agent~~ (Task Force Officer - mkd)
Homeland Security

Sworn to telephonically and signed electronically this 20th day of December , 2019.



~~Hon. Marky K. Dimke~~ Mary K. Dimke (mkd)
United States Magistrate Judge